REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for indicating that claim 29 is allowed.

Disposition of Claims

Claims 1-29 are pending in this application. Claims 1, 10, 13, 17, 26 and 29 are independent. The remaining claims depend, directly or indirectly, from claims 1, 10, 13, 17 and 26. Claim 29 has been allowed by the Examiner on page 13 of the Detailed Action; however, Applicant respectfully notes that the Office Action summary page appears to erroneously indicate that claim 29 is rejected.

Drawings

Although not indicated by the Examiner on the Office Action Summary, the drawings were objected to by the Official Draftsperson in the present application. In response to the objections, Applicant submits replacement sheets for Figures 1-9 to overcome any potential objections by the Examiner. Applicant hereby requests that the newly submitted drawings be acknowledged as formal by the Examiner.

Objections

The Examiner reminded the Applicant of the proper language and format for the Abstract of the present application. The Abstract has been replaced with a clear and concise Abstract in accordance with the Examiner's suggestions.

Rejections under 35 U.S.C. § 112

Claims 7 and 23 stand rejected under 35 U.S.C. 112, second paragraph, for lack of antecedent basis for the limitation "the condition of said constructed element." Claims 7 and 23 have been amended by this reply to clarify the antecedent basis issue with respect to the aforementioned limitation. Accordingly, withdrawal of this rejection is respectfully requested.

Rejections under 35 U.S.C. § 103

Claims 1-3, 8-12, 17-19, and 24-28 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,635,089 ("Burkett") in view of U.S. Patent No. 6,615,223 ("Shih"). This rejection is respectfully traversed.

The present invention relates to providing an API model for directory operations. Specifically, the present invention allows an application to be written independent of the hierarchical structure of a directory information tree (DIT). Rather, the structural information of the DIT is specified in a template. When the structure of the DIT changes, the application is left unchanged, and only the template is updated. The method of the present invention allows an application to call a software API in order to add an entry to the directory, and the API software uses a template for information regarding the DIT to determine the location where the new entry is to be added. Further, the API software uses the template to determine default attribute values, required attributes, etc. Thus, when an application program provides a set of attributes to be added to the DIT, the application program does not need to be aware of the structural hierarchy of the DIT, and therefore, the application does not provide a location within the DIT (i.e., is location independent) to place the attributes. Rather, the template uses structural information included within the template itself to generate a destination location as opposed to using embedded tags, special marking, etc., for the set of attributes.

In contrast to the present invention, Burkett relates to marking XML files to indicate that the content of the XML file is to be updated automatically to reflect changing information. Burkett further relates to a method for specifying that a data repository should be accessed as the source of the updates to the XML file. Specifically, Burkett discloses that an XML parser reads the XML file and constructs a Document Object Model (DOM) tree based on the syntax of the tags embedded in the XML file (see Burkett, col. 2, ll. 44-50). However, Burkett fails to disclose or suggest that the XML file is capable of independently determining a location without any additional location information from another source. Accordingly, Applicant respectfully disagrees with the Examiner's assertion that the XML file referred to by Burkett is an XML template as defined in the present invention.

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With respect to the rejection of claim 1, the Examiner admits that Burkett fails to disclose or suggest a template that receives a first set of attributes from an application program, where the first set of attributes does *not* include a location within the DIT. However, the Examiner asserts that Burkett discloses constructing an entry to be added to the DIT using the received first set of attributes. However, if Burkett does not disclose receiving a first set of attributes, then Burkett cannot possibly disclose constructing an entry with the exact same *received set of attributes* admittedly not taught by Burkett. Thus, it is clear that Burkett does not disclose either of the aforementioned limitations recited in claim 1 of the present invention.

Further, Shih does not disclose that which Burkett lacks. Specifically, Shih relates to data replication in a database system. Shih relates to adding a new LDAP directory entry to the DIT, where the new entry is then replicated at a separate LDAP directory site. However, Shih fails to disclose or suggest that the attributes do not include a location within the DIT. Rather, Shih specifically discloses providing attributes and entry information that *includes a location* (*i.e.*, last name, first name, entry number, etc.) within the DIT (see, *e.g.*, col. 8, ll. 66-68, col. 9 ll. 1-7). Further, Shih does not disclose a template containing structural information (*i.e.*, hierarchical information) of the DIT that receives the attributes and determines a location within the DIT for the entry to be placed.

In view of the above, Burkett and Shih, whether considered separately or in combination, fail to render claim 1 of the present invention obvious to one of ordinary skill in the art. Thus, claim 1 is patentable over Burkett and Shih. Further, independent claims 10, 17, and 26 contain similar allowable subject matter to claim 1 (*i.e.*, passing information that does not contain a location within the DIT) and are allowable for at least the same reasons. Further, claims 2, 3, 8, 9, 11 12, 18, 19, 24, 25, 27, and 28 depend directly or indirectly from independent claims 1, 10, 17, or 26 and are allowable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 4 and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Burkett in view of Shih and in further view of U.S. Patent No. 6,480,865 ("Lee"). As described above, Burkett and Shih fail to teach or suggest the invention recited in claims 1 and 17, to which claims 4 and 20 depend, respectively. Further, Lee fails to teach that which Burkett and Shih lack.

Specifically, Lee does not disclose receiving a set of attributes that does not specify a location within the DIT. Further, Applicant respectfully disagrees with the Examiners assertion that the Document Type Definition (DTD) that specifies the XML schema includes a verification program to verify an attribute ID of a document. A DTD schema that includes restrictions for an XML document is not the same as the template specifying a verification program of the present invention. Specifically, a verification program verifies one or more already present attributes associated with the DIT, while the schema restriction completely prohibits attributes from being included within an XML document. Moreover, Lee does not disclose that the DTD schema is a template that includes functionality to construct an entry for a DIT and determine a location for the entry. Thus, Burkett, Shih, and Lee whether considered separately or in combination, fail to render claims 4 and 20 of the present invention obvious to one of ordinary skill in the art. Accordingly, claims 4 and 20 are patentable and withdrawal of this rejection is respectfully requested.

Claim 5-7 and 21-23 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Burkett in view of Shih and further in view of U.S. Patent No. 6,609,121 ("Ambrosini"). As noted above, Burkett and Shih fail to teach the limitations of the independent claims. Further, Ambrosini fails to disclose or suggest a template including structural information of a DIT, which is used to determine the location of an entry to be added into the DIT. Accordingly, claims 5-7 and 21-23 are patentable for at least the same reasons above and withdrawal of this rejection is respectfully requested.

Claims 13 and 15-16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Burkett. Independent claim 13 contains similar allowable subject matter as independent claim 1. Thus, claim 13 is patentable over Burkett for at least the same reasons as above. Claims 15-16 depend from claim 13, and are patentable for at least the same reasons. Accordingly, withdrawal of this rejection is respectfully requested.

Claims 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Burkett in view of Lee. As noted above, neither Burkett nor Lee, whether considered separately or in combination, teach or suggest the present invention as recited in independent claim 13. Thus, dependent claim 14 is patentable for at least the same reasons as claim 13 above. Accordingly, withdrawal of this rejection is respectfully requested.

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Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 03226.541001; P6180).

Dated: November 12, 2004

Respectfully submitted,

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